

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ERIC WILLIAMS
T/U/O Mayor & City Council
of Baltimore City

Plaintiff

-vs-

H. D. INDUSTRIES, INC.

Defendant

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INTERROGATORIES

TO: H. D. INDUSTRIES, INC., Defendant

BY: ERIC WILLIAMS, Plaintiff

TheThe Plaintiff, pursuant The Plaintiff, pursuant to the The Plaintiff, pursuant to the Maryland R
Interrogatories:

(a)(a) The reference in these Interrogatories to Defendant (a) The reference in these Interrogatories to De
attorneys, agents, servants, representatives or any person or firm acting in its behalf.

(b)(b) If such Defendant shall not have the information to answer any(b) If such Defendant shall not have
knowknow the nameknow the name and address of the person or organization whoknow the name and address of the
information and names and addresses shall be disclosed in the Answer.

(c)(c) Name , identify , and list , their synonyms or d(c) Name , identify , and list , their syn
business addresses at the time of the accident and at the present time.

1.1. State1. State the name and address of each expert or person from whom you will elicit opinion
testimony whom you intend to call as atestimony whom you intend to call as a witness in thistestimony whom yo
youyou will rely to qualify each expert or person from whom youyou will rely to qualify each expert or person fr
court,court, (to include, but not to be limited to, disclosing each and every pcourt, (to include, but not to be limi
he/shehe/she is the author or co-author thereof and the subject matterhe/she is the author or co-author thereof and
activitiesactivities relatingactivities relating to expert review of a caseactivities relating to expert review of a case

to, case reviews, reports, depositions, and hereto, case reviews, reports, depositions, and hearings; taken, by way of deposition or trial, identify the case caption, and subject matter upon which expert rendered their opinion; expert rendered their opinion; and with regard to this case, state the complete facts upon which their conclusion/opinions rest and the basis/reason for each fact held.

2.2. 2. Name each and every eyewitness to all or part of the occurrence, describing their location at the time of the occurrence, and their addresses; all persons at the time of the occurrence, and their addresses; all persons who arrived at the time of the occurrence, and their addresses; and all persons who arrived at the time of the occurrence, and their addresses, within 24 hours after the occurrence.

3.3. Name all persons who made any investigation to ascertain any damages claimed by Plaintiff.

4.4. If you contend that a person, partnership or corporation, whether or not a4. If you contend that a action,action, causedaction, caused or contributed to the occurrence or should be made a party foraction, caused or thethe facts upon which you relythe facts upon which you rely and identify suchthe facts upon which you rely and claim,claim, and identify each such person, partnership or corporation with such detailclaim, and identify each such them as a party to this claim.

5.5. State 5. State the manner in which the Defendant says the occurrence Occurrence to mean the events which took place on October 6, 1999.

6.6. Identify each and every document or other item of real evidence relevant to this case.

7.7. Identify the corporate structure as of date of7. Identify the corporate structure as of date of inci7.
employees,employees, identifying each president, vice president, otheremployees, identifying each president, vice
divisions,divisions, number of engineers on staff and if youdivisions, number of engineers on staff and if you have
statementstatement or corporatestatement or corporate directory which reflects the information called forstatement
attach.

8.8. Identify each person who has given you oral, signed or recorded evidence concerning the occurrence and attach hereto a copy of any evidence concerning the occurrence statement in your possession statement in your possession or control statement.

9.9. Identify who manufactured and who assembled the machine which injured the Plaintiff,

the date it was manufactured and assembled, and state the address of the place at the date it was manufactured and/or assembled.

10.10. Identify who designed the machine which injured the Plaintiff, when it was designed. State the individual's training, experience and qualifications to so design such a machine.

11.11. Identify by date and company or individual name, the chain of sales from the product in question from first creation to ultimate sale to you. If any other products were made by your salesperson to induce the sale.

12.12. 12. Identify each and every claim, complaint, lawsuit, government investigation in which you or your product was involved, the nature and dates of the injuries caused, claimed mechanism of injury, identify the party mechanism of injury, identify the claim, complaint, lawsuit or investigation, and if a lawsuit or investigation, and if include the full case caption, number and court, and name of the product involved in this litigation.

13.13. Id13. Identify13. Identify each13. Identify each13. Identify each and13. Identify each an
accepted practice or custom or standard which was inaccepted practice or custom or standard which
machine which injured the Plaintiff.

14.14. 14. Identify each and every governmental or industry guideline, regulation, r14. Identify each
accepted practice or custom or standard accepted practice or custom or standard which was considered bu
of the type of machine which injured the Plaintiff.

15.15. State whether, at any time, you or a person on your behalf con15. State whether, at any time, you
analysisanalysis concerning possible safety oranalysis concerning possible safety or health hazards of the product.
describe thedescribe the nature and results ofdescribe the nature and results of each test, study or analysis, identify
it, and identify each document which refers to it.

16.16. 16. If you intend to use at trial a simulation, (computer or actual), experiment, test, analysis, analysis, identify the person who created or performed it, or write each document that refers to it.

17. Identify each and every safety hazard which was identified or considered in the development of the type of product involved this litigation, identify the person having personal knowledge of the facts, and if any such safety consideration was reduced to writing, or the facts, and if any such safety consideration was reduced to writing, identify each such document or writing and attach a copy.

18. Identify each and every safety precaution incorporated in the design and manufacture of defendant's product of the type which injured Plaintiff to prevent or minimize injuries caused to individuals who may go into the body of the asphalt containment portion to persons who have personal knowledge of such facts and identify each document or writing containing information relevant to this topic.

[illegible]

20.20. State each and every test that was performed at your direction concerning 20. State each and every type of the type of product involved in this litigation from the time of its original design to the date of Plaintiff's injuries, which tests were performed for Plaintiff's injuries, which tests were performed for identifying the persons participating in each such test, when each such test took place, and if there are any documents which contain information are the subject of a recommendation for tests but not attach such documents.

21.21. If any documents accompanied the sale of this product, concerning the use of the product, accompanied the sale of the product, concerning the use of the product, c

22. 22. If you provided or directed anyone on your behalf to provide any training concerning the use of your product, state the training provided or the train which should have been provided.

23.23. If you secured a patent for the product, all documents provided to secure the patent.

2424.24. If there has been any federal, state or governmental or industrial investigation of24. If there has been any federal, state or governmental or industrial investigation of the product, state the date of the investigation, identify the government agency that conducted the investigation, describe the investigation, and the results of the investigation and the documents created as a result of the investigation.

25. Identify who your competitors are in the market for the product which is the subject of this litigation, both now and at the time that the product was sold to the City.

MARK E. HERMAN
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Baltimore, Maryland 21201
(410) 837-2144

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of Baltimore City

Plaintiff

-VS-

H. D. INDUSTRIES, INC.

Defendant

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NOTICE OF SERVICE OF DISCOVERY

II HEREBY CI HEREBY CERTIFY that on I HEREBY CERTIFY that on this 2nd day of December, 2019, Plaintiff sPlaintiff s Interrogatories were mailed,Plaintiff s Interrogatories were mailed, postagePlaintiff s Interrogatories were mailed, postage paid by First Class Mail, Baltimore, Maryland 21202, to Defendant;Defendant; and Thurman W. Zollicoffer, Jr., Esq., City Solicitor, Mayor & City Council of Baltimore, 101 City Hall, Baltimore, Maryland 21202.

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Attorney for Plaintiff Eric Williams